

7312 35th Avenue NE • Marysville, WA 98271
360-651-7000 • 877-SNO-ISLE • sno-isle.org

February 27, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: Reference CC Docket No. 02-6 Request for Waivers

Appellant/BEN: Sno-Isle Rural Library System, BEN #145230

Program: Universal Service E-rate Program

Program Year: 2015-16

471 #: 1014849

FRN #: 2806450

FRN Amt: \$5,811.02

SPIN: Western Telematic, Inc (WTI) 143047957

Contact: Claire O'Flaherty, E-rate Expertise, 31115 N. Mason Ave, Tacoma, WA 98407
Cell: 253-320-0664, Email: claire@erateexpertise.com

We are writing to request a waiver of the Universal Service E-rate Program requirement that a Service Provider Annual Certification (SPAC) Form # 473 be submitted each year.

The Sno-Isle Library's 471 application for 2015-16 included a funding request for UPS Power Controller Units from Western Telematic, Inc. and the FRN was approved in USAC's Funding Commitment Decision Letter dated September 25, 2015. (See above for relevant SPIN, 471 and FRN numbers and the dollar amount.) Unfortunately, after the purchase was made, there was a staff turnover at WTI and the new contact person refused to participate in E-rate or sign the annual 473 form required for the library to receive its reimbursement.

The library was initially told by USAC's Customer Service to submit a Good Samaritan Request to switch the SPIN number to another vendor who would be willing to assist us. That letter was submitted on September 26, 2016 but we have not received an official response from USAC. A copy of that request and the supporting documentation, including the invoice and proof of payment in full, is enclosed with this letter. We later talked to someone in the USAC invoicing department who thought that Good Samaritan Requests may not be technically possible because of the reimbursement system and procedure changes that were made last summer. He suggested that a better approach to resolving this issue would be a 473 waiver request from the FCC.

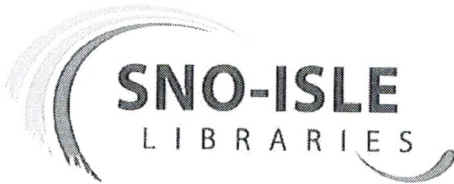
We would greatly appreciate your assistance in resolving this issue so that the Sno-Isle Library can receive the \$5,811 that is due to them for this approved funding request. If you have any questions, please contact our consultant Claire O'Flaherty who would be pleased to answer any questions or provide you with any additional documentation you require. Thank you very much for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "G. Sitzman".

Gary Sitzman

Administrative Services Director



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September 26, 2016

Good Samaritan Request

Schools and Libraries - Correspondence Unit
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

Program Year: 2015-16
Billed Entity #: Sno-Isle Library 145230
471 #: 1014849
FRN #: 2806450
FRN Amt: \$5,811.02
Original SPIN: 143047957
New SPIN: 143005588

Dear Correspondence Unit:

I am writing to request a Good Samaritan SPIN change for a 2015 category 2 purchase (USAC Case # 118272). Western Telematic, Inc. (WTI) established their company as a SPIN during the 471 application process, but a staff turnover happened since that time and they will no longer participate in the E-rate program. CDW has graciously agreed to act as a Good Samaritan in this case and is willing to become the new SPIN.

This letter includes several attachments to support our request, including:

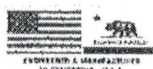
- A copy of the bill from WTI showing the purchase was made
- Proof of bill payment by Sno-Isle Library
- Confirmation from CDW for their willingness to participate in this Good Samaritan process
- Copy of an Invoice Deadline Extension request to allow for additional time to process this request and the BEAR form (USAC Case #22-908107)
- LOA authorizing our consultant to act on the library's behalf in resolving this matter

If you have any questions or need any further information, please do not hesitate to contact our consultant Claire O'Flaherty at claire@erateexpertise.com or 253-503-3505. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "G. Sitzman", written over a light blue horizontal line.

Gary Sitzman
Administrative Services Director



INVOICE

Page: 1

Western Telematic, Inc.
5 Sterling, Irvine, CA 92618-2517
(949) 586-9950

Invoice Number: 0136986-N
Invoice Date: 3/18/2016
Ship Date: 3/18/2016
Order Number: 0119350
Order Date: 3/11/2016
Salesperson: MC15
Customer Number: SNO_JSL

Sold To:
SNO-ISLE LIBRARIES
ATTN: ACCOUNTS PAYABLE
7312 35TH AVE NE
MARYSVILLE, WA 98271

Ship To:
SNO-ISLE LIBRARIES
TEL: 877-766-4753
ATTN: JOHN MULHALL
7312 35TH AVE NE
MARYSVILLE, WA 98271

Customer P.O.	Ship VIA	F.O.B.	Terms			
EN-5467	FEDEX GROUND		Net 45			
Item Number	Unit	Ordered	Shipped	Back Ordered	Price	Amount
PTS-8NE15-1R	EACH	25	25	0	452.99	11,324.75
POWER TRANSFER SWITCH 120V						
S/N 01840311160693 - 01840311160717						
Wise: 000						

X Xiana 3/29/16

Only 21 units included in 471.

Tracking Number: 455923299828;
Thank you for your order!
For assistance regarding this shipment, please contact: customerservice@wti.com
For additional information regarding WTI products and services: www.wti.com

Net Invoice: 11,324.75
Freight: 175.00
Sales Tax: 0.00
Invoice Total: \$11,499.75

Currency in US Dollar



Online Banking

Full Analysis Bus Checkng - 0016: Account Activity Transaction Details

Check number: 00000056385

Post date: 04/19/2016

Amount: -11,499.75

Type: Check

Description: Check

 7312 35th Avenue NE Marysville, WA 98271	Bank of America CASC 19 271210 CHECK DATE 3/31/2016	56385 56385 CONTROL NUMBER 11499.75
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****Eleven Thousand Four Hundred Ninety Nine and 75/100 Dollars

PAY

Western Telematic, Inc
5 Sterling
Irvine, CA 92618-2517

TO THE ORDER OF

Analyn W. [Signature]

1056385 125000024 00009000016

DO NOT WRITE IN THESE SPACES

WESTERN TELEMATIC INC.

POSTED ONLY

CITY NATIONAL BANK

ENTER HERE

Claire O'Flaherty

To: Kathy Fleischman
Cc: 'Gary Sitzman'
Subject: RE: Good Samaritan Request

I think we are all set to submit the request. Thanks for your help Kathy!
Claire

Claire O'Flaherty
E-rate Expertise, Inc.
3115 N Mason Ave
Tacoma, WA 98407
Tel: 253-503-3505
Cell: 253-320-0664

From: Kathy Fleischman [mailto:kathfle@cdw.com]
Sent: Tuesday, September 27, 2016 12:10 PM
To: Claire O'Flaherty <claire@erateexpertise.com>
Cc: 'Gary Sitzman' <GSitzman@sno-isle.org>
Subject: RE: Good Samaritan Request

Good Afternoon Claire,
We are willing to be your Good Samaritan for the request of reimbursement.
I understand we were not the original Service provider but are verifying we have reviewed your invoice and proof of payment for the goods provided by Western Telematic.

Will this conclude what is needed from CDWG? Or are you in need of something that needs a signature and date?

If my email will suffice, that's great. If you need something else, let me know how we can help.

Thank you
Kathy

Kathy Fleischman
Senior A/R - E-Rate Specialist | **CDW Government**
Phone: 847.419.6325 | Fax: 847.419.6625
[Kathfle@cdw.com](mailto:kathfle@cdw.com)

From: Claire O'Flaherty [mailto:claire@erateexpertise.com]
Sent: Tuesday, September 27, 2016 2:02 PM
To: Kathy Fleischman
Cc: 'Gary Sitzman'
Subject: Good Samaritan Request

Kathy,

Thank you so much for your willingness to act as the Good Samaritan for the Sno-Isle Library. As we discussed, CDW will be named as the SPIN for a product that was provided by Western Telematic, Inc. (WTI).

I spoke with USAC, and the procedure will be as follows:

SIL will submit a Good Samaritan request to USAC. Once the request is approved, CDW will be named as the new SPIN, but you will also get some kind of notification acknowledging that you did not actually provide the product. We do NOT need to file another 486 form with CDW as the SPIN (different from what we discussed the other day). SIL will file for an Invoice Deadline Extension along w/ the Good Sam request to make sure we don't miss the deadline while our request is under review. Once the request is approved, SIL will file an online BEAR form. Given the recent changes in how E-rate payments are processed, CDW will not have to approve the BEAR nor receive the funds and process the reimbursement check. It looks like your only involvement is to receive a letter stating you are a Good Samaritan.

For your records, I am sending you a copy of the WTI invoice and proof that SIL paid it in full. Note that 4 of the units purchased serve only the administrative service center which is a Non-Instructional Facility that is not eligible for E-rate funding so we cost allocated them out of funding request.

I would appreciate it if you could please respond to this email with confirmation of your willingness to do this so that I can document it in our records. We are so grateful you are willing to help the library out in getting these funds!

Thank you very much!

Claire

Claire O'Flaherty
E-rate Expertise, Inc.
3115 N Mason Ave
Tacoma, WA 98407
Tel: 253-503-3505
Cell: 253-320-0664

Claire O'Flaherty

From: sldnoreply@sl.universalservice.org
Sent: Friday, October 14, 2016 12:18 PM
To: claire@erateexpertise.com
Subject: RE: Initial Contact, 22-908107

Thank you for your inquiry.

Your request has been received and is under review.

If you have any further questions, please feel free to contact our Schools and Libraries Helpline at 1-888-203-8100. Please remember to visit our website for updates: <http://www.usac.org/sl>

Thank you,
Schools and Libraries Division
Universal Service Administrative Company

-----Original Message-----

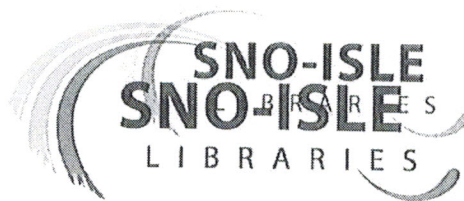
From: claire@erateexpertise.com
Subject: Initial Contact

[FirstName]=CLAIRE
[LastName]=O'FLAHERTY
[JobTitle]=Consultant
[EmailAddress]=CLAIRE@ERATEEXPERTISE.COM
[WorkPhone]=2533200664
[FaxPhone]=
[PreviousCaseNumber]=0

[FormType]=Invoice Extension
[Owner]=DEADLINEEXTENSIONS
[DateSubmitted]=9/26/2016 8:13:33 PM
[AttachmentFlag]=Y[Question2]=We would like to request an invoice deadline extension for the following funding request:

Program Year: 2015-16
Billed Entity #:Sno-Isle Library 145230
471 #: 1014849
FRN #: 2806450
FRN Amt: \$5,811.02
SPIN: 143047957 Western Telematic, Inc. (WTI)

*Extension granted until
5/30/2017*



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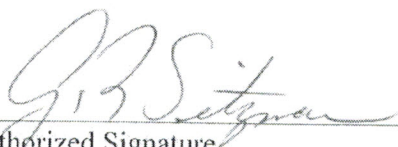
Letter of Authorization

November 2, 2015

As an authorized representative for the Sno-Isle Regional Library (BEN # 145230), I give my permission for Claire O'Flaherty at E-rate Expertise, Inc. (CRN # 16055051) to act on Sno-Isle Regional Libraries' behalf in regards to the E-rate program.

This authorization includes activities such as filling out E-rate forms, researching and resolving various issues relating to forms and funding, responding to USAC inquiries, and working with service providers to secure bids and to ensure the library receives accurate reimbursements.

This permission covers the all funding years up to and including 2016-2017.


Authorized Signature

11/2/2015
Date

Gary Sitzman
Administrative Services Director
Sno-Isle Regional Libraries
7312 35th Ave. NE
Marysville, WA 98271

Phone: 360-651-7009 / E-mail: gsitzman@sno-isle.org